



Date August 31, 2017

Tonya Howell, Remedial  
Project Manager  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Blvd  
Lenexa, Kansas 66219

Re; Engineering Evaluation/Cost Analysis (EECA Revision 02 - Dated August 22, 2017) and the Final Report Revision 02 (Dated August 23, 2017) for the Des Moines TCE Superfund Site

Ms. Howell,

The Iowa DNR has reviewed the above mentioned reports for the Des Moines TCE Superfund Site (DICO) in Des Moines, Iowa. The Iowa DNR offers the following, limited comments regarding the on-site, aldrin contaminated building materials.

EE/CA Revision 02 - Dated August 22, 2017;

The EE/CA evaluates and compares three removal options. These alternatives include: (1) No Action, (2) Building Demolition with Off-site Disposal, and (3) Building Demolition with On-site Containment. The Iowa DNR supports EPA's preferred alternative, #2-Building Demolition with Off-Site Removal. The EE/CA states, in part;

*"Pesticides detected in the slab foundations of the Maintenance Building and Building 4 contained Resource Conservation and Recovery Act (RCRA) listed wastes as a result of spills of listed waste when Aldrin (Hazardous Waste Code P004) stored in the Maintenance Building was transferred to Building 4 and sprayed onto fertilizer."*

*"It is unclear if contamination within the remaining buildings and slab foundations on site derived from poor waste management or releases of product that is not RCRA listed waste. Therefore, the source is unknown and is not considered a RCRA listed waste. Pesticides detected in Buildings 1, 2, and 3; and the slab foundation remaining for Building 5 may contain RCRA characteristic waste and therefore would be sampled prior to disposal."*

Final Report Revision 02 (Dated August 23, 2017);

The Final Report summarizes field work, trend results, and the risk assessment addendum associated with site data collected in June 2016. The Field Summary Trip Report (Appendix A) (1) provides information on soil, sediment, and surface water at the site; and (2) assesses remaining buildings for hazardous chemicals in anticipation of possible building demolition and redevelopment. The Final Report states in part;

*"Chemicals of concern are chemicals that were used in the former buildings and considered hazardous substances based on environmental regulations or because they may harm human health or the environment. These chemicals include the following:*

- Pesticides and herbicides used to control insects or weeds. These are commonly found in homes, and if used properly, are considered safe. Because the former company at this facility created and stored pesticides, certain environmental regulations consider these chemicals to be listed or characterized as hazardous".*

U.S.EPA Letter (and attached Updated Hazardous Waste Determination for OU4 EE/CA);

A letter dated August 23, 2017 (and received on August 29, 2017) addressed to Alex Moon, Bureau Chief of Iowa DNR Land Quality from Mary Peterson, EPA Region 7 Superfund Division Director states that;

- “• *Given the use of pure aldrin that occurred in Building 4 and the Maintenance Building, debris containing pesticides from the remaining foundation of Building 4 and the Maintenance Building is considered P-listed hazardous waste. As listed hazardous waste, demolition debris containing pesticides from the maintenance building and the foundation of Building 4 would be disposed of in a hazardous waste landfill. Building 4 and Maintenance Building foundation debris may contain trace amounts of contaminants such that a "contained in/contained out" determination could be made which would result in such debris not meeting the criteria of a listed hazardous waste.”*

The highest aldrin concentration detected in the Maintenance Building or Building 4 slab foundations was 640 ug/kg in concrete sample SB-05 collected from the Maintenance Building pad.

In view of the conditions that currently exist on-site, the Iowa DNR believes that, regardless of the compound and the sample location, all waste materials generated during building demolition be sampled and managed in accordance with the appropriate State and RCRA classification based on waste characteristics. In other words, the Iowa DNR questions whether the “RCRA Listed Waste” characterization applies to any of the material left on-site.

Sincerely,

Hylton Jackson, Iowa DNR Contaminated Sites

Cc; Amie Davidson, Iowa DNR  
Alex Moon, Iowa DNR  
David Scott, Iowa DNR  
Susan Johnson, Iowa DNR  
William Ehm, Iowa DNR  
Mel Pins, Iowa DNR